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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

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10 UNITED STATES OF AMERICA,) 2:15-mj-00507-VCF
11 Plaintiff,)
12 vs.) STIPULATION TO CONTINUE
13 PEDRO LUIS SALDANA,) PRELIMINARY EXAMINATION
14 Defendant.) (4th REQUEST)
15 _____)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
17 United States Attorney, and Nadia Ahmed, Special Assistant United States Attorney, counsel
18 for the United States of America, and Paul Riddle, Assistant Federal Public Defender, counsel
19 for defendant Pedro Luis Saldana, that the Preliminary Examination currently set for Monday,
20 October 5, 2015 at 4:00 p.m., be vacated and continued for thirty (30) days or to a date and time
21 convenient to the Court.

22 This stipulation is entered into for the following reasons:

23 1. The parties are in the process of negotiating a resolution of the case that would
24 obviate the need for trial. The parties need additional time to do so.

2. The Defendant is in federal custody and in the process of being transported by the United States Marshal service to this district.

3. Denial of this request for a continuance would prejudice both the Defendant and the Government and unnecessarily consume this Court's valuable resources, taking into account the exercise of due diligence.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested by this stipulation, is excludable in computing the time within which the defendant must be indicted and the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(b) and § 3161(h)(8)(A), considering the factors under 18 U.S.C. § 3161(h)(8)(B)(I) and (iv).

6. This is the fourth request for a continuance of the preliminary examination in this case.

DATED this 2nd day of October, 2015.

Respectfully submitted,

DANIEL G. BOGDEN
United States Attorney

/s/ Paul Riddle
By: _____
Paul Riddle
Assistant Federal Public Defender
PEDRO LUIS SALDANA

/s/ Nadia Ahmed
By: _____
Nadia Ahmed
Special Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,) 2:15-mj-00507-VCF
)
Plaintiff,)
)
 vs.) ORDER CONTINUING PRELIMINARY
)
)
Pedro Luis Saldana,)
)
Defendant.)
)

Based on the pending stipulation of counsel, and good cause appearing therefore, the court hereby finds that:

IT IS HEREBY ORDERED that the deadline to continue the preliminary examination, currently scheduled for October 5, 2015, at the hour of 4:00 p.m., is continued to November 5
_____, 2015. at 4:00 p.m.

DATED this 2nd day of September, 2015

UNITED STATES MAGISTRATE JUDGE